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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MARIJA ANDESILIC and PASSION
LOWE, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

RUBBERMAID INCORPORATED,

Defendant.

Case No. 2:25-cv-03736-HDV-SK

District Judge Hon. Hernán D. Vera

**STIPULATION TO CONTINUE
BRIEFING SCHEDULE ON
DEFENDANT'S MOTION TO
DISMISS**

*[Proposed Order filed concurrently
herewith]*

1 Plaintiffs Marija Andesilic and Passion Lowe and Defendant Newell Brands,
2 Inc., by and through their respective counsel, hereby stipulate and agree as follows:

3 1. Plaintiffs filed their Second Amended Complaint on August 28, 2025
4 (ECF No. 27).

5 2. Defendant filed a Motion to Dismiss Second Amended Complaint on
6 September 29, 2025 (ECF No. 29).

7 3. Pursuant to Local Rule 7-9, Plaintiffs' deadline to file an opposition to
8 the Motion to Dismiss Second Amended Complaint is November 20, 2025, which is
9 21 days before the originally noticed hearing date of December 11, 2025 (ECF No.
10 29). Pursuant to Local Rule 7-10, Defendant's deadline to file a reply in support of
11 the Motion to Dismiss Second Amended Complaint is November 28, 2025, which is
12 14 days before the originally noticed hearing date.

13 4. Currently, the hearing date of Defendant's motion to Dismiss has been
14 continued by the Court's order to December 18, 2025 (ECF No. 32).

15 5. Good cause exists for the requested extension because the Parties are
16 currently engaged in active and productive discussions regarding a potential
17 resolution and require additional time to continue those efforts. The Parties have met
18 and conferred in good faith and, through their respective counsel, jointly agree that
19 continuing the related briefing deadlines and hearing date for Defendant's Motion to
20 Dismiss will best serve judicial economy and conserve the resources of both the
21 Court and the Parties.

22 6. The Parties therefore request that Plaintiffs' deadline to file an
23 opposition be continued by 32 days to December 22, 2025; that Defendant's reply
24 brief be due three weeks after any opposition is filed; and that the hearing be re-
25 scheduled on a date convenient to the Court, but not fewer than 14 days after the
26 reply brief is filed.

27 IT IS HEREBY STIPULATED:
28

1 1. Plaintiffs' deadline to file an opposition to Defendant's Motion to
2 Dismiss Second Amended Complaint shall be continued to December 22, 2025.

3 2. Defendant's reply brief in support of the Motion to Dismiss Second
4 Amended Complaint shall be due three weeks after the opposition is filed, if any, by
5 January 12, 2026.

6 3. The hearing on Defendant's Motion to Dismiss Second Amended
7 Complaint shall be re-scheduled on a date convenient to the Court, but no sooner
8 than January 26, 2026, 14 days after the reply brief is filed.

9
10 IT IS SO STIPULATED.

11
12 DATED: November 14, 2025

Respectfully submitted,

13 **CLARKSON LAW FIRM, P.C.**

14
15 By: /s/ Bahar Sodaify
16 Ryan J. Clarkson
 Bahar Sodaify

17 *Attorneys for Plaintiffs*

18 DATED: November 14, 2025

19 **SHOOK, HARDY & BACON L.L.P.**

20 By: /s/ Russell L. Taylor
21 Tammy B. Webb
22 Mitch Engel
23 Kate Frerking
 Russell L. Taylor

24 *Attorneys for Defendant*

ATTESTATION OF FILER

Pursuant to Local Rule 5-4.3.4, the undersigned filer hereby attests that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: November 14, 2025

CLARKSON LAW FIRM, P.C.

/s/ Bahar Sodaify

By: Bahar Sodaify

Attorneys for Plaintiffs